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Via ECF

Hon. Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 2203  
New York, NY 10007

November 28, 2022

Re: *Vargas v. Montefiore Medical Center*  
Case No. 22 CV 07721

Dear Judge Abrams:

Plaintiff submits this letter in response to Defendant's November 14, 2022, motion for partial dismissal. (ECF Nos. 10-13). Per Your Honor's Individual Rules and Practices, Plaintiff writes to inform the court that in lieu of opposing Defendant's motion, Plaintiff intends to file an amended complaint on or before December 5, 2022. As such, Defendant's Answer will be due on or around December 19, 2022.

This new timeline affects the Court's current deadline of November 30, 2022, for the parties to submit a joint letter and case management plan as well as the initial court conference set to occur on December 5, 2022. Therefore, with consent from Defendant, Plaintiff respectfully requests that those events be postponed.<sup>1</sup> We respectfully suggest the parties' initial documents be due on a date after December 27, 2022, and that the initial status conference be rescheduled at least one week thereafter in light of the upcoming holidays.

We thank Your Honor for the time and consideration of this request.

Application granted. The telephonic initial pretrial conference is adjourned to January 20, 2023 at 4:30 p.m.; Call-In Number: (888) 363-4749; Access Code: 1015508#. No later than January 13, 2023, the parties shall file a joint letter and proposed case management plan, as described in the Court's prior order.

SO ORDERED.

  
Hon. Ronnie Abrams  
United States District Judge  
11/29/2022

Respectfully Submitted,

  
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Michelle A. Caiola  
Attorney for Plaintiff  
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<sup>1</sup> Plaintiff previously requested an adjournment of these same events on November 11, 2022 (ECF No. 6) because Defendant had not yet appeared or submitted a responsive pleading to the Complaint. Your Honor granted the request on November 15, 2022 (ECF No. 14).